SCIENCE & GOVERNMENT REPORT

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NY State Considers Curbs on Genetic Research

New York. Yet another important development has occurred in the long, torturous saga of attempts to control potentially hazardous genetic engineering experiments in the United States. Last week, the Attorney General of New York convened a public hearing to discuss whether legal restrictions should be placed on recombinant DNA experiments performed in laboratories in the state. New York is the first state to consider regulating genetic engineering research, and its actions will thus be closely watched elsewhere.

The central issue in the public hearings here is whether safety guidelines recently issued by the National Institutes of Health (SGR Vol. VI, No. 12) are sufficiently strict to prevent genetically modified viruses or bacteria escaping from laboratories and causing a health hazard. The guidelines, adopted after months of heated dispute in the scientific community, place voluntary restrictions on research supported by NIH, but they do not apply to industrial research and they are not backed by legal sanctions. New York is therefore considering whether to adopt regulations, enforceable by law, to govern all recombinant DNA research in the state.

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Though officials in the Attorney General's office insist that they have reached no decision on whether state-level regulation is needed, a likely move would be for New York to enforce the NIH guidelines throughout the state. If the New York state government adopts the guidelines as state regulations, it could enforce them in the same manner as other public health controls by requiring the filing of reports, periodic checks of facilities and so on. Such a move would have important implications.

Other states may follow suit. Already, the City Council of Cambridge, Mass., has imposed a moratorium on some types of genetic engineering experiments at Harvard and MIT, while a citizens' commission is drafting recommendations for controlling recombinant DNA research in the city. (SGR Vol. VI, No. 13). That moratorium, which was due to expire on October 7, has quietly been extended to January 7 to give the commission more time to make its recommendations.

Meanwhile, a committee of the San Diego City Council has also been holding public hearings on recombinant DNA research, though no legislation has yet been submitted there. Thus, several local governments are beginning to mull the matter over.

If New York does adopt the NIH guidelines without imposing any additional restriction, such a move would be seen as an endorsement of the guidelines, and it may help persuade other states that more restrictive controls are not needed. The reverse would, of course, also be true.

Since health hazards associated with recombinant DNA research would not be limited to a single geographic region, it would not make much sense for

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In Brief

Staff aide Harley Dirks, who has been calling the signals for the powerfully situated but doddering Senator Warren G. Magnuson (D-Wash.), chairman of the Labor-HEW Appropriations subcommittee, has resigned, effective December 1. His planned departure follows revelations in *Science* that a multi-volume set of "hearings" allegedly held by the committee actually never took place, but were pasted together from written statements that the subcommittee ordered from "witnesses," including some of the top brass of NIH.

More graduate science and engineering students are paying for their own educations, according to NSF. Figures for 1975 show that more than 32 per cent of the 290,700 graduate students were self- or family-supported, compared to 29 per cent the previous year. The increase parallels a drop in federal agency funds for fellowships and traineeships. NSF, for example, went from $16.4 million to $9.7 between 1973 and 1975. The data are in NSF Publication 76-320, available without charge from NSF, Division of Science Resources Studies, 1800 G St. N.W., Washington, DC 20550.

Interesting reading, and likely to be influential, in science-policy planning: "Measuring and Evaluating the Results of Federally Supported Research and Development," Part I, report of Congressional hearings held last May. Copies of the 99-page report available without charge from the Science and Technology Committee, House of Representatives, Rayburn Building, Washington, DC.

Academy Head Hits Restrictions on Recombinant DNA Studies

The National Institutes of Health (NIH) has published a compendium of documents, correspondence, articles and other materials relating to the development of its guidelines on recombinant DNA experiments (SGR Vol. VI, No. 12). A noteworthy omission from the publication, however, is an outspoken letter from Philip Handler, President of the National Academy of Sciences, to Donald Fredrickson, Director of NIH, in which Handler criticized opponents of the research and made a strong plea for the research to be controlled by voluntary guidelines rather than by legal regulations.

The omission is noteworthy since Handler's letter was one of several written by members of an ad hoc committee convened by Fredrickson to review a late draft of the NIH guidelines before they were published. Letters from virtually every other committee member were published, but NIH officials told SGR that Handler asked that his letter be left out because he considered it a personal communication.

Proceeding from the observation that the guidelines "in all likelihood" are "overly cautious," but as guidelines "seem eminently reasonable," Handler argued in his letter that the hazard of creating new forms of pathogenesis by transplanting genes from higher organisms into bacteria is "fanciful" and "extremely remote." He suggested that the hazard "can certainly not be the basis for stringent regulation."

Handler then went on to state: "The point of my letter is to urge you not to follow all that advice to convert suggested 'guidelines' into hard rules or regulations — no matter in what detail these can be presented and defended. *Guidelines* further research, *regulations* stop research." He added, "I greatly fear the institution of hard regulations modeled on the 'guidelines,' with penalty clauses for infraction, etc. I know where such a course would end."

Handler also warned in his letter to Fredrickson that the scientists urging a moratorium on recombinant DNA experiments "represent a political as well as a scientific view; although vocal, they are certainly in a minority of the total community." The situation, he said, is "analogous to that which, for so long, resulted in continuation of prohibition in many states, i.e., an effective alliance between the bootleggers and the church. At your meeting, there was operative, in effect, a coalition between a group of very young scientists of a homogeneous political cast with attorneys who deeply believe in governmental regulation. The former were intent on stopping research; the latter do not understand that regulation of research in order to protect the public may very easily destroy the will to research so that, in the end, the public interest will have been thwarted, not served."

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one city to outlaw the research and for another to allow it to go ahead with few controls. Thus, if the states do decide to regulate the research themselves, it would be sensible for them to adopt similar regulations. For those reasons, William Gartland, Director of NIH's recombinant DNA research office, said at the New York hearing that NIH would have no objection if New York were to adopt the NIH guidelines as state regulations.

It should be noted, however, that NIH deliberately chose to control recombinant DNA research by voluntary guidelines rather than by legal regulations. The choice was made for a number of reasons. First, many scientists resent direct government regulation of basic research because regulation carries implications of restricting academic freedom and stifling creativity.

But the chief consideration was that NIH is not set up to be a regulatory agency and it would be in a difficult position as both regulator and supporter of the research. (The British government, it should be pointed out, has circumvented that potential conflict of interest by setting up an independent body to regulate recombinant DNA experiments — SGR Vol. VI, No. 15).

Thus, many people who consider the NIH guidelines strict enough to guard against health hazards are worried about the fact that there is no legal enforcement procedure, and that the guidelines do not apply to researchers supported by agencies other than NIH. It is therefore not suprising that state and local governments are considering ways to enforce the guidelines in all research facilities.

The New York hearings involved about a score of witnesses, most of whom have been in the forefront of the debate over the potential risks and benefits of recombinant research. The witnesses offered advice ranging from suggestions that New York should ban the research entirely, to arguments that the NIH guidelines are so strict as to be totally irrational.

Nobel Prize laureates George Wald and James Watson were probably the most outspoken witnesses on each side, with Wald arguing for a prolonged moratorium, and Watson calling the debate over recombinant DNA research "the most overblown thing to enter the American scene" since the Kennedy-era fallout-shelter controversy. —CN

Drop in British Pound Threatens CERN Project

London. Europe's hitherto successful cooperation in high-energy physics is being strained by continuing economic difficulties in the hardest hit European countries. The European Organization for Nuclear Research (CERN) is threatened by Britain's collapsing pound and, paradoxically, the strength of the Swiss franc.

Last year it cost Britain just over £18½ million (then about $40 million) for its share of the cost of maintaining CERN, which has large experimental facilities, including accelerators and other high-energy physics apparatus, straddling the Franco-Swiss border near Geneva. This year, the fall of the pound, down more than 40 per cent, is pushing up Britain's costs to such an extent that it may have to withdraw from part of CERN's research program.

The crisis at CERN has come just when the laboratory is commissioning its latest large facility, the 400-GeV superproton synchrotron (SPS).

In 1975 Britain paid just over 16 per cent of the cost of CERN. Its contribution compared with 25 per cent from West Germany, 21½ per cent from France, 13 per cent from Italy, and smaller contributions from eight other countries.

As the pound falls, Britain has to part with more and more of them to pay its share of CERN's budget. In the past the British government has compensated the Science Research Council (SRC) — which doles out the funds for scientific research in universities, national establishments, and international organizations — to make up for currency fluctuations. This year the government told the SRC that it will cover only £2 million of the anticipated £6 million increase in the cost of the SRC's international commitments. Last year out of a total budget of just under £100 million the SRC spent £31 million on foreign projects: £18½ million to CERN; £6½ million to the European Space Agency; £4½ million to the Institute Laue Langevin, and the rest on various lesser programs.

The SRC will be hard pressed to find the extra £4 million without crippling home research. Last month it sent out an urgent "stop spending" directive to the larger consumers of research funds, and asked for revised budgets that would save more money. The SRC was forced to act because if it does not put the brakes on spending now, it will run out of cash before the end of the financial year — thanks to both the falling pound and continuing inflation at home. In the recent past the government has insisted that it will not, as it has in the past, pick up the tab for any cost overruns.

CERN fears that Britain's difficulties could force it to withdraw from part of the laboratory's research program. One candidate for the chop could be the Intersecting Storage Rings project, which is now being refurbished for a new three-year program. And if Britain drops out of this project, then other countries — perhaps Italy, which is suffering as badly as Britain on the economic front — might follow suit, forcing CERN to close down this facility.

This is the first time in CERN's 20 years that it has faced a crisis of this magnitude. The laboratory has grown fat — its staff numbers 5000 — during a long period when its demands for more money went all but unchallenged. Last year, however, CERN's member countries told the organization to cut its budget by delaying spending on new projects. CERN responded by lopping Sw. Fr 5 million — the Sw. Fr is about 40 US cents — off the Sw. Fr 224 million budget of the 300-GeV program, with a further Sw.Fr 10 million taken off the budget for 1977. The overall effect would be to increase the spending from Sw.Fr 36.5 million to Sw.Fr 77.2 million in 1979 when, if all goes well, Europe's economic climate will be healthier.

The financial constraints on research are damaging the fragile unity of the British scientific community. High energy physicists have never been wildly popular, thanks to their insatiable and growing appetite for research funds. Now that the scientific community is fighting over a shrinking budget, the knives are out. And CERN is one of the major targets.

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Social Sciences Hit by a New Breed of Critics

Virtually all of the tumult that marked gatherings of the social and behavioral science clans in the late sixties and early seventies has disappeared along with campus riots and other paroxysms of intense political dissent. But at recent annual meetings of these professions, the mass demonstrations of yesteryear have been replaced by carefully targeted attacks from both inside and outside the scholarly ranks.

For example, Ralph Nader told the American Psychological Association at its fall convention in Washington that social and behavioral scientists fail to serve the public interest because they fail to ask the right questions. At the same time, Alfred McClung Lee, a senior sociologist, told his colleagues much the same thing in his presidential address to the American Sociological Association's annual meeting, in New York. Both asserted that the two professions have a special responsibility to see the world as clearly as possible because that is what they claim to do.

Social Science Report

In a special invited address that may have made some wonder why they tried so hard to get him on the program, Nader told a captivated APA audience that social and behavioral scientists pass along a distorted view because they fail to study the workings of power and powerful institutions. He took special aim at educational testing, blaming psychologists for what he characterized as society's excessive use of tests in allocating talent.

But, characteristically, Nader's subject was the larger issue of how to bring psychologists into the consumer movement, and he concluded that they can't make it if they concentrate on studying individuals and groups outside the context of powerful social and economic institutions that deeply affect their lives.

One of the problems of almost all professions, he said, "is that they almost never study up; they study down, they study horizontal, but they do not study up in terms of the hierarchy of power."

He noted that "sociologists don't do very much of this. They'll study, for example, Middletown, Ohio, or Newburyport, Massachusetts, and they'll study various mass movements. But you have to search far and wide to see a sociological study of such institutional apparitions as Exxon . . . the Pentagon" or other powerful organizations. The anthropologists are just as negligent, he added, and he charged that psychologists don't seem to do much better.

"It's fascinating to watch the interest the psychologist will have in studying the individual mind — the human mind — outside of an institutional context. But there doesn't seem to be much of a tradition to study the corporate mind, or the corporate executive mind." And while he stopped somewhat short of saying that researchers would rather gain what power they can than confront the powers that be, he speculated that they don't study up because that might bring with it "all kinds of subtle ostracism, retribution, demotion, or what have you."

The result of all this stooped inquiry, said Nader, is that researchers adopt the same kind of double standard which he said is all too pervasive throughout society. The economy is almost always studied from the production side, not from the consumer perspective, he said, the assumption being that what is good for the GNP is good for society, even if it may be destructive of health and happiness.

Research on energy, he said, always focuses on the lifestyles of individuals, although, he pointed out, industry consumes the lion's share of energy. The question always posed, however is whether the final consumer will lower the thermostat.

Nader said one need only look in just about any direction to see the same "twisted approach." For example, he said, "individuals can be described as having mental disorders." If someone "was seen soiling his or her nest by urinating in the kitchen soup, that would be considered a mental disorder." But, he added, when chemical plants "are systematically poisoning the source of our drinking water," they are rarely diagnosed as mentally disturbed.

Nader softened his remarks only slightly by indicating that social and behavioral scientists are far being from the only offenders, and by inviting them to organize a public interest dimension to the profession. After all, he said, most professions "have certain common indicia: they're stagnant; they are self-centered; they are entrapped by their own cogs; they have their own ideological cage that sometimes they try to break out of; they think they're very important; they often are very exclusive;" and, he added, "they figure their world view is of a certain kind of unique centrality in terms of understanding society."

In an address which Nader would have applauded, Lee told the sociologists that they are so caught up in their professionalism and the hustling that goes with it that many wind up leaning "on the purloined sham of legitimacy provided by scientism and by investigative assignments serving the special interests of profit and power."

Lee argued that "the character of any sociological

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Safety of US Reactor Questioned in Britain

London. Britain's swelling debate over the safety of nuclear power has produced a high-level scientific dissent that is likely to inflame further the US controversy over the efficacy of emergency core cooling systems — the apparatus that is supposed to deactivate a reactor in the event of a runaway accident.

The dissent, which is yet to receive much notice in the US, was voiced by Sir Alan Cottrell, the recently retired chief scientific adviser to the British government, in connection with a three-year study headed by Sir Walter Marshall, chief scientific adviser to the energy minister and deputy chairman of the UK Atomic Energy Authority (UKAEA). Marshall's study gave a clean bill of health to the pressure vessels used in the Westinghouse pressurized water reactor (PWR), but it voiced some reservations, and evoked Cottrell's expression of reservations.

The Marshall study was initiated when Britain was reviewing its reactor program, and there was a strong lobby in favor of PWRs. Early in the study, Cottrell raised the possibility of PWRs suffering a "fast fracture." Cottrell accepts much of Marshall's report, but he still maintains that while it may be possible to build safe pressure vessels, not enough is known about their long-term behavior, and the durability of their safety features.

The 156-page report concludes that if pressure vessels are made in strict accordance with the standards laid down in the US, they will have "a high integrity and reliability at the start of service." However, the study highlights gaps in knowledge of what could happen "under emergency and fault conditions."

Cottrell's critique of the report focuses on three of its conclusions. One is that: "The emergency safety injection system should inject water at as high a temperature as compatible with other requirements with the aim of reducing the thermal shock during a large LOCA (Loss of Coolant Accident)." Cottrell also refers to the report's conclusion that operational transients should be confined to narrow limits to avoid excessive crack growth by metal fatigue. He also questions the

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inquiry depends upon by and for whom it is conceived and applied. This means," he explained, "that the credibility, privileges, and opportunities of sociological work constitute a kind of territory over which professional practitioners, and to a lesser extent, politico-economic interest groups contend for influence and control. It also means that sociologists usually do not transcend their own habitual intellectual orientations related to their sexual, social class, ethnic, racial, and other identities."

While sociologists claim to serve only their curiosity, he said, it is clear that they are often serving their own career interests. "Somehow they try to devote themselves to 'science for its own sake.' Such a 'purely scientific' sociological attitude is often taken to be a value-neutral or a naive one. It may yield results ranging in social significance from dilettantish verbal fretworks to seemingly radical syntheses of existing social knowledge."

However, he pointed out, in American society sociologists "are almost always professionals." As such, "they are caught up in the practical expendiencies of careerism and therefore inclined to act robotlike in terms of the mandates of the marketplace. They are disposed to obligate themselves to the demands of academic administrators, to political and business establishments that operate educational and research organizations, to book publishers, and to those who provide subsidies for special projects of research, writing and consultation." And, he added, "the professional's critical concern with career-insurance gives advantage not only to the merely conservative but also to the stodgy."

Lee said that it is getting harder and harder to attract "the experimentally minded, the perceptive, and the literate into the field." And if they do accidently arrive at sociology's doorstep, they are not likely to stay around long. Early in their training, he said, "fledgings . . . come to take for granted that they have only these options: (1) commitment to an orthodoxy, or (2) cynical acceptance of an orthodoxy as a cover for a life of hustling, of entrepreneurism, or (3) training in enough dehumanized techniques to fit themselves for a bureaucratic slot in government or industry, or (4) autonomous creativity accidentally protected by university tenure . . . or (5) some other discipline or way of life."

Lee suggested that the only way sociology can survive is if sociologists "see themselves as part of the social and intellectual struggles" to make human living more humane. Even a "necessarily institutionalized discipline" can be kept alive and fresh he said by "questioning, dissenting and creative participants."

Sociology's goal, he said, should be to "develop knowledge of direct service to people as citizens, as consumers, and as neighbors." —PM

Swedish Premier Backtracks on Nuclear Power

The new Swedish government, under the leadership of Thorbjorn Falldin, has already begun to softpedal on its election promise to turn its back on nuclear power.

Falldin's pledge to halt the development of nuclear power was widely considered to be a major factor in his victory over Olof Palme's Social Democrats (SGR Vol. VI, No. 17), but in its first major policy statement, the new government announced that it will allow Sweden's five operating plants to remain in business, and a sixth to be refueled, pending the results of a study by a special commission.

The statement does, however, have some harsh things to say about nuclear power, and warns that there may be plant closures in the future unless several key nuclear safety and environmental questions are soon resolved.

According to an unofficial translation, Falldin's policy statement — an outline of intended legislation similar to a State of the Union Address in the United States — promises "an energy policy that ensures supplies of energy and safeguards employment, and which allows freedom of action in the future."

After promising more research on renewable sources of energy, such as solar energy, wind power and geothermal heat, the statement goes on to warn that nuclear plants now under construction in Sweden may not be put into operation unless satisfactory methods of getting rid of radioactive wastes have been developed.

Those are tough conditions, which are unlikely to be met by the time the plants are ready to be put into operation. Even in the United States, there is no proven method for disposing of radioactive wastes, and no commercial reprocessing facility is yet in operation anywhere in the world. But Falldin has given himself an out if necessary by creating a special commission to advise the government on its nuclear policies.

The commission will look into the environmental and safety problems of nuclear power, and "work out feasible models for a new draft energy policy which will be put before the 1978 Riksdag [legislature]. A stand-by plan for phasing out nuclear power will be drawn up so that it can be implemented if the safety problems cannot be solved. The commission is to demonstrate how long-range supplies can be ensured with recourse to the various alternative courses of action and present estimates of expenditure."

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report's emphasis on rigorous ultrasonic inspection of pressure vessels.

In June, Cottrell described the report as "a first class report, impressively thorough and objective." On the whole, he appeared to accept its conclusions, and by implication its "green light" for PWRs in the UK. But by August, he appeared to have changed his mind. On hearing that the UKAEA was telling the government to abandon its chosen reactor in favor of a proven design — which meant a PWR or a UK-designed Advanced Gas Cooled reactor (AGR) — Cottrell told Energy Secretary Tony Benn that present information on rates of crack growth and transients in the operation of PWRs "does not guarantee that these pressure vessels will be able to operate safety for the full design life of the reactor."

Cottrell's criticism carried all the more weight in Britain because his scientific career was as a metallurgist.

Marshall replied to Cottrell's letter, drawing attention to the apparent difference of opinion between it and the earlier endorsement of the report. Marshall said, "It does seem that you are choosing to make the same points that we have made, but with a different emphasis," adding, "So far as transients are concerned I believe we are, in strict logic, saying the same thing, but you are choosing to emphasize that the safety of the vessel is not guaranteed until the utility has verified that the transients lie blow a certain range, whereas we have chosen our recommendations in a form which implies that we expect the utility to be able to do that. . ."

Cottrell ended his letter with a boost for the Steam Generating Heavy Water Reactor that the UKAEA had just warned the government against building because of its high launch costs and the slump in demand for new power stations. Thus it could be that Cottrell was willing to accept the pressure vessel study when it looked purely academic, but when the PWR was suddenly catapulted back on to the market he moved to raise doubts about its safety — just as he had done two years earlier.

Whatever the motives behind the debate in Britain, it will be surprising if the anti-nuclear movement in the US does not leap on to the few doubts raised by the Marshall report. After all, it points to yet another uncertainty on the effectiveness of Emergency Core Cooling Systems. It would be uncharacteristic of the anti-nuclear brigade to ignore this ammunition, no matter how many qualifications are made in the report.

—MK

White House Science Appointments; SERI Delayed Again

The White House has announced appointments to the President's Committee on Science and Technology (PCST), the top-level advisory committee established as part of its new science advisory network.

PCST has a Congressional mandate to conduct a two-year review of the health of American science and technology, particularly federal support thereof, after which it may be maintained as a general advisory committee if the President wants to keep it in business.

As previously announced, the chairman of the committee is Simon Ramo, co-founder of TRW Inc. Vice chairman of the committee is William O. Baker, President of Bell Labs. Other members are: Otis R. Bowen, Governor of Indiana; W. Glenn Campbell, Director of the Hoover Institute on War, Revolution and Peace, Stanford University; Edward E. David Jr., Vice President of Gould Inc., and former science adviser to Nixon; Elizabeth H. Leduc, Professor of Biology, Brown University; Fritz J. Russ, President, Systems Research Laboratories, Dayton Ohio; Charles P. Slichter, Professor of Physics, University of Illinois; Charles H. Townes, Professor of Physics, University of California at Berkeley; and W. Bradford Wiley, Chairman of John Wiley and Sons.

Ramo and Baker are both longtime participants in the Washington science advisory network. They were chairmen of committees established by President Ford late last year to pave the way for re-establishment of the White House Office of Science and Technology Policy. They were also co-chairmen in 1972 of a committee of scientists supporting the candidacy of Richard Nixon.

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The selection of a contractor to operate the much-sought-after Solar Energy Research Institute (SERI) has been put back by at least another three months. The Energy Research and Development Administration (ERDA), the agency in charge of the facility, has announced that it won't be able to choose a contractor and a location for SERI at least until next March, which means that the Institute may not be off and running until July.

ERDA received 20 proposals from would-be contractors in various parts of the United States (SGR Vol. VI, No. 6). But after much study, a special site selection board has eliminated only one of them. The board will now conduct oral and written discussions with the remaining contestants, including site visits, and the final selection will be made by ERDA Administrator Robert C. Seamans Jr.

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New Lobby Aims to Emulate Common Cause

Though the addition of yet another lobbying group to the already overcrowded field in Washington isn't usually a noteworthy event, the debut last month of a so-called citizens' lobby on international issues deserves a bit of attention.

Called New Directions, the outfit is interesting so far chiefly for its star-studded cast of backers and its lofty ambitions. Modelled on Common Cause, New Directions is intended to be a grass roots organization with "hundreds of thousands" of members, which will try to focus political attention on such issues as arms control, population growth, depletion of natural resources, human rights and governmental decision-making.

Like other lobbying groups, it will take its case directly to members of Congress and Administration officials, seek publicity in the news media, organize local groups and, perhaps, make some direct campaign contributions.

Full-time director of the group is Russell Peterson, a former Republican governor of Delaware, who resigned recently as chairman of the President's Council on Environmental Quality to head New Directions. Chairman of the organization's council is anthropologist Margaret Mead, a longtime activist on a variety of scientific and societal issues.

A planning commission filled with luminaries from various pressure groups and other organizations concerned with international affairs has been quietly discussing the need for such a group, and its administrative arrangements, for the past two years. Among more than 100 members of the commission were Robert McNamara president of the World Bank; Vernon Jordan, head of the National Urban League; Sargent Shriver, who, among many things, once headed the Peace Corps; Lester Brown, Director of the Worldwatch Institute, and Kingman Brewster, President of Yale.

New Directions — with dues of $25 per year — plans to work closely with other groups already active on such issues. If it achieves its goal of attracting even 100,000 members, the group will have a healthy lobbying budget.

There are, however, plenty of problems to be overcome before New Directions can become a potent force on the political scene. First, it must overcome the ho-hum attitude that will inevitably greet the formation of yet another concerned pressure group. Common Cause managed because it was the first outfit of its kind, and attracted a lot of favorable press publicity in its early days. New Directions cannot count on such treatment.

Moreover, when planning began, there was a clear need for such an organization because many groups, such as the Overseas Development Council and most environmental organizations, would have lost their tax exempt status if they engaged in active lobbying. The recently enacted tax law has removed some of those restrictions, however, and thus the need for a new lobbying group is not quite so great.

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